

1<sup>st</sup> October 2021.

**PETER J YATES BA (Hons) M Phil MRTPI responding to the Inspector's Question 155 in the MIQ in relation to Matter 9 Historic Environment: World Heritage Site.**

### **Introduction.**

I have been involved with all stages of the preparation and Examinations leading to the adoption of the Local Plan Strategy in July 2017. I have also submitted representations on both the Publication Draft SADPD (August 2019) and the Revised Publication Draft SADPD (October 2020). These include Housing Policies in Local Service Centres & Safeguarded Land, the Site Selection Methodology, Housing Density and Jodrell Bank. This Position Statement focuses on those aspects which relate to Jodrell Bank.

**Question 155 Is the distinction between the JBO Consultation Zone for radio interference and the WHS Buffer Zone, and the respective planning and heritage considerations that apply within each, clear from Policy HER 9 and its supporting justification?**

**No. Policy SE14 of the LPS is concerned with development that impairs the efficiency of the telescope as well as the impact on the historic environment, and in para 13.163 indicates that it will produce further detailed policy and advice in the SADPD.**

**This has not happened.**

**Policy HER 9** is concerned with the **World Heritage Site**, and refers to a **Buffer Zone**, but provides no detailed guidance. There appears to be no indication on the Draft Adopted Policies **Map**, of the area that this zone relates to, or its detailed policies. The **Glossary** has no explanation of what a Buffer Zone consists of.

Policy HER 9 refers to the World Heritage Site, but does not provide as much guidance as is provided in **Section 16 Conserving & Enhancing the Historic Environment** in the NPPF on how development proposals within an undefined Buffer Zone will be assessed. There is in fact, **no reference in Policy HER 9 or the Supporting Information to the NPPF.**

Similarly, there is no detailed policy advice regarding how development proposals will be assessed in relation to their impact **on the efficiency of the telescope.**

### **The Consultation Zone & the Buffer Zone.**

The **Consultation Zone** has been in operation **since 1973**. It covers a very extensive area as shown on the **Strategy Key Diagram of the LPS (Figure 1.1)**. It extends northwards towards Chelford, north east to the outskirts of Macclesfield, southwards to the built up area of

Congleton, and eastwards to Sandbach and Middlewich. The Zone includes Holmes Chapel and Goostrey.

It is assumed that a **Buffer Zone** would be **more like a Conservation Area**, where development proposals will be assessed in relation to their impact on the world heritage site, and its setting, including important views of it. **Such a Zone is likely to cover the immediate environs of Jodrell Bank.**

**The scale of these Zones and their functions are very different**, and require specific detailed policies to address development proposals. The **Consultation Zone** defines the area within which the University of Manchester should be consulted on planning applications, so as they can consider whether the proposed development might impair the efficiency of the Radio Telescope. Development within the will **Buffer Zone** require a **Heritage Impact Assessment**, which the Council will be responsible for assessing in terms of the impact on the World Heritage Site.

The difference between these Zones and their functions requires two separate detailed policies which have not been forthcoming in the SADPD. The **inadequacy of Policy HER 9** is not helped by the reference in **para 5.33** that:

*This policy must be considered in conjunction with Policy SE 14 Jodrell Bank.*

This statement *does not* provide the clear guidance required in assessing and reaching a decision on planning applications.

#### **Position on detailed guidance.**

The **Key Evidence used to support Policy SE14 in the LPS in 2017** is listed under the policy. It includes:

- 2, Jodrell Bank Design Guide (under preparation).**
- 4. Jodrell Bank Management Policies (under preparation).**

Despite being over 4 years ago, there would appear that these documents have not been prepared and consulted upon?

#### **Current approach to development proposals with the Consultation Zone.**

**The LPS allocated many Strategic Sites for residential development in the Consultation Zone.** These are in the Key Centres of Congleton and Sandbach.

In **Holmes Chapel**, a Local Service Centre, which is much closer to Jodrell Bank than the Key Centres, **622 houses have been built between 2010-21 (Cheshire East Council's Housing Monitoring Statistics to 31<sup>st</sup> March 2021)**. In addition, **further commitments** in terms of permissions for **248 houses** existed at 31/3/21.

Despite this large scale and on-going development, many applications for single houses, including barn conversions, on the outskirts of the Consultation Zone are refused on the grounds of their impact on the efficiency of the Radio Telescope.

**The approach of the Council is inconsistent** in that it does not always consult the University of Manchester. Similarly, the University does not always respond. When responding the University usually has a standard letter indicating that whilst the impact may be small, the cumulative impact could be greater. The Council's response to this is inconsistent, sometimes it gives it little weight, at others it is used as a reason for refusal. This can be for very similar development ie a single house in a built up area.

**The lack of consistency of decision making is related to the general nature of Policy SE14. This is an important reason why the SADPD should contain the promised detailed guidance.**

A specific policy is required which addresses how development proposals will be looked at, and if there are any mitigation works or materials which could help to reduce any potential interference in terms of the operation of the Radio Telescope.

This detailed guidance could address the important factors of the distance and direction of proposed development from the Radio Telescope.

**What is clear from Policy HER 9 is that it needs to be replaced by a more specific and clearly worded and detailed policy, and that this is cross referenced with the details of the Buffer Zone shown on the Draft Adopted Policies Map.**

**Rather than trying to link the heritage policy with the scientific policy, a separate specific and detailed policy should be provided, which deals with how development proposals will be assessed, and this should be cross referenced with an updated Consultation Zone shown on the Draft Adopted Policies Map.**

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